

EXHIBIT G

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

ROCKWELL AUTOMATION, INC. and
ROCKWELL AUTOMATION TECHNOLOGIES, INC.,

Plaintiffs,

v.

WAGO CORPORATION and
WAGO KONTAKTECHNIK GmbH & CO. KG,

Defendants.

Case No. 10-CV-718-WMC

**PLAINTIFFS ROCKWELL AUTOMATION, INC. AND ROCKWELL
AUTOMATION TECHNOLOGIES, INC.'S AMENDED INITIAL DISCLOSURES**

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, plaintiffs Rockwell Automation, Inc. and Rockwell Automation Technologies, Inc. ("Plaintiffs") hereby provide the following amended initial disclosures. These disclosures are based upon information reasonably available to Plaintiffs as of the date they were prepared. Accordingly, Plaintiffs expressly reserve the right to clarify, alter, amend, modify, or supplement the information contained in these initial disclosures.

By making these disclosures, Plaintiffs do not represent that they are identifying every document, item of electronically stored information, tangible thing, or witness that might be relevant or have relevant information related to the claims, defenses, and counterclaims asserted in this action. Rather, Plaintiffs' disclosures represent a good faith effort to identify information Plaintiffs reasonably believe to be relevant to Plaintiffs' claims and Defendants' expected defenses (bearing in mind that Defendants have yet to answer the Complaint).

These initial disclosures do not constitute a waiver of any objections Plaintiffs may have, now or in the future, to any discovery in this action. Plaintiffs expressly reserve any and all objections that it had, has, or may ever have, including, but not limited to, objections based upon:

attorney-client privilege; work-product immunity; any other applicable privilege or immunity under federal or state law; relevance; competency; hearsay; immateriality; overbreadth; and undue burden or harassment.

Plaintiffs expressly reserve the right to identify or call as witnesses other individuals in addition to those identified herein, and to identify additional documents, electronically stored information, and/or tangible things, if they discover that such individuals have or might have knowledge of matters relevant to this action or that such additional documents, electronically stored information, and/or tangible things are relevant to this action. Plaintiffs also expressly reserve the right to identify or call expert witnesses in accordance with Federal Rule of Civil Procedure 26(a)(2) and any scheduling order entered in this action.

(A) **Individuals** – The following table lists the names and the last-known address of individuals likely to have discoverable information that Plaintiffs may use to support their claims based upon the information reasonably available at this time or upon reasonable belief. The individuals whose names are marked with an * are current employees of one of Plaintiffs, and thus, may only be contacted through counsel for Plaintiffs at (212) 408-5100.

<u>Name</u>	<u>Address</u>	<u>Subject</u>
Steven Blech	1307 Waldo Way Twinsburg, OH 44087	Relevant Information Regarding U.S. Patent No. 6,745,232
Gregory Majcher*	1037 Orchard Lane Broadview Heights, OH 44147	Relevant Information Regarding U.S. Patent No. 6,745,232
John Caspers*	717 Appaloosa Trail Racine, WI 53402	Relevant Information Regarding U.S. Patent No. 6,745,232
Jeffrey Hamilton	10634 Crestview Drive Cedarburg, WI 53012	Relevant Information Regarding U.S. Patent No. 7,123,974
James Kay*	9525 Tanager Drive Chardon, OH 44024	Relevant Information Regarding U.S. Patent Nos. 6,801,813 and 7,065,415
David Johnston*	7947 Aileen Drive Mentor, OH 44060	Relevant Information Regarding U.S. Patent Nos. 6,801,813 and 7,065,415

<u>Name</u>	<u>Address</u>	<u>Subject</u>
Shelly Urdaneta	1611 Sunview Road Lyndhurst, OH 44124	Relevant Information Regarding U.S. Patent Nos. 6,801,813 and 7,065,415
Stuart Siegel*	8796 Arrowood Drive Mentor, OH 44124	Relevant Information Regarding U.S. Patent Nos. 6,801,813 and 7,065,415
Phil Muren*	1 Allen Bradley Drive, Mayfield Heights, OH 44124	Licensing of the asserted patents
Doug McEldowney*	1 Allen Bradley Drive, Mayfield Heights, OH 44124	Licensing of the asserted patents
Ron Bliss*	1 Allen Bradley Drive, Mayfield Heights, OH 44124	Marketing, Sales, Functionality of Rockwell Products
Robert Kretchmann*	1 Allen Bradley Drive, Mayfield Heights, OH 44124	Rockwell Patent Program and Policies
Dan Schumacher*	1 Allen Bradley Drive, Mayfield Heights, OH 44124	Sales of Rockwell Products
Jeff Zacharias*	1 Allen Bradley Drive, Mayfield Heights, OH 44124	Sales of Rockwell Products
Arthur Zatarain	401 Arlington Dr. Metairie, LA 70001	Liability Expert
Emmett Murtha	Three Parklands Drive Darien, CT 06820	Damages Expert

<u>Name</u>	<u>Address</u>	<u>Subject</u>
One or more representatives of each of Defendants	<p>Address: unknown</p> <p>Information: The design, development, structure, function, operation, use, manufacture, importation, distribution, marketing, sales (including sales revenues and other financial information), and offers to sell Defendants' Accused Instrumentalities and/or any product covered by any of the claims of the Patents-In-Suit; the corporate relationship between and among Defendants and other related business entities; Defendants' acquisition of any product information related to products made, used, offered for sale, and/or sold by Plaintiffs that embody one or more claims of the Patents-In-Suit; Defendants' awareness and knowledge of the Patents-In-Suit.</p>	

(B) **Documents** – The following are categories of documents, electronically stored information, and tangible things that are in the possession, custody, or control of Plaintiffs that may be used to support their claims, based upon the information reasonably available at this time:

1. Documents concerning ownership of the Patents-In-Suit;
2. Documents concerning the prosecution histories of the applications that led to the Patents-In-Suit;
3. Documents concerning the design and development of products embodying one or more claims of the Patents-In-Suit; and
4. Documents concerning the sales and marketing of products embodying one or

more claims of the Patents-In-Suit.

All documents are located at Plaintiffs' offices at the following addresses:

Rockwell Automation Technologies, Inc.
1 Allen Bradley Drive
Mayfield Heights, OH 44124

Rockwell Automation, Inc.
1201 South Second Street
Milwaukee, WI 53204-2496

(C) **Damages** – Plaintiffs have prepared a computation of damages claimed as evidenced by the July 6, 2012 expert report of Emmett Murtha. Plaintiffs will make available for inspection and copying documents sufficient to show or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered.

Based on current information available to Plaintiffs, Plaintiffs disclose the following: Plaintiffs will seek damages for defendants violation of 35 U.S.C. § 271 which will be in the form of Plaintiffs' lost profits, a reasonable royalty for the use of the patents made by Defendants, or a combination of the foregoing so as to adequately compensate Plaintiffs for the Defendants' infringement as required under 35 U.S.C. § 284, but without providing double recovery and as may be limited by 35 U.S.C. § 286. Plaintiffs also will seek the award of pre-judgment and post-judgment interest.

(D) **Insurance Agreements** – Plaintiffs do not believe that either of them is a party to any agreement that relates to this action and “under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.”

Dated: July 26, 2012

/s/ Paul Tanck _____

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COUNSEL FOR PLAINTIFFS
ROCKWELL AUTOMATION, INC.
and ROCKWELL AUTOMATION
TECHNOLOGIES, INC.

CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of July, 2012 a copy of this document is being served by hand on Defendants' counsel Marshall Schmitt of the Michael Best & Friedrich law firm.

Dated: July 26, 2012

s/ Paul Tanck

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